

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Advanced Television Systems	)	MB Docket 87-268
And Their Impact upon the Existing	)	
Television Broadcast Service	)	

TO: Office of the Secretary  
ATTN: The Commission

**COMMENTS OF CAPITAL COMMUNITY BROADCASTING, INC.**

Capital Community Broadcasting, Inc. (CCBI), licensee of noncommercial educational television Station KTOO-DT, Juneau, Alaska, through its attorneys and pursuant to Section 1.415 of the rules, hereby files its Comments in response to the Commission's *Seventh Further Notice of Proposed Rule Making* (Notice) in the above-referenced proceeding proposing a new DTV Table of Allotments.

The Commission has invited licensees to suggest corrections to the proposed DTV Table, *Notice* at page 7, para. 16. As explained in the attached engineering statement, the proposed allotment for Station KTOO-DT, Channel \*10, is inaccurate. As licensed in File No. BLEDT-20040730ABD, Station KTOO-DT operates on Channel \*10 at ERP of 1 kW with an antenna radiation center at minus 363 meters AAT, at coordinates Latitude 58°17'56" N, Longitude 134°24'07'W. However, the proposed allotment is for ERP of 0.748 kW with an antenna radiation center at 1 meter AAT, at coordinates Latitude 58°18'04" N, Longitude 134°25'21' W. The engineering statement demonstrates that the

facilities specified in the proposed DTV Table do not correctly reflect the licensed station parameters and would needlessly fall short of replicating Station KTOO-DT's licensed digital service contour.

WHEREFORE, for the foregoing reasons, CCBI respectfully requests that the DTV Table be amended as set forth herein.

Respectfully submitted,

**CAPITAL COMMUNITY  
BROADCASTING, INC.**



By: \_\_\_\_\_  
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January 23, 2007

**ENGINEERING TECHNICAL STATEMENT PREPARED BY WILLIAM T. GODFREY, JR. OF THE FIRM KESSLER AND GEHMAN ASSOCIATES, INC., TELECOMMUNICATIONS CONSULTING ENGINEERS IN CONNECTION WITH THE SEVENTH FURTHER NOTICE OF PROPOSED RULE MAKING REGARDING THE PARAMETERS ASSIGNED IN THE PROPOSED DTV TABLE OF ALLOTMENTS FOR THE CAPITAL COMMUNITY BROADCASTING, INC. POST-TRANSITION DIGITAL TELEVISION BROADCAST FACILITY, KTOO-DT CHANNEL \*10, JUNEAU, ALASKA.**

The firm Kessler and Gehman Associates, Inc. was retained by the Capital Community Broadcasting, Inc. (CCB), Juneau, Alaska to review the KTOO-DT Channel \*10 post-transition facility's technical parameters assigned in the FCC's proposed DTV Table of Allotments contained in the Seventh Further Notice of Proposed Rule Making (7<sup>th</sup> FNPRM) and to prepare comments for filing if detailed engineering studies reveal inaccuracies with respect to the proposed technical parameters.

**Discussion**

CCB is licensed to operate the KTOO-TV Channel \*3 analog facility with a maximum effective radiated power (ERP) of 0.5 kW with an antenna height radiation center of -323 meters above average terrain (AAT) using a Jampro model JAT2/2-3 nondirectional antenna (BLET-20041026AFZ). CCB is also licensed to operate the KTOO-DT Channel \*10 facility with a maximum ERP of 1 kW with an antenna height radiation center of -363 meters AAT using a Dielectric model TF-2HT nondirectional antenna (BLEDT-20040730ABD).

The FCC released the 7<sup>th</sup> FNPRM on October 20, 2006 which included the proposed DTV Table of Allotments (TOA). In the 7<sup>th</sup> FNPRM, it states that interested parties may file comments on or before January 11, 2007 (now extended to January 25<sup>th</sup>) with respect to the

proposed DTV Table and asks that licensees review the accuracy of their information contained in the proposed DTV Table, including comments on any inaccuracies or discrepancies. In its Digital Channel Election application (First Round Election), CCB elected to release analog Channel \*3 and lock-in its assigned digital Channel \*10 for post-transition operation. Accordingly, the FCC assigned KTOO-DT with digital Channel \*10 in the proposed DTV TOA. The licensed KTOO-DT Channel \*10 facility operates with an ERP of 1 kW with an antenna height radiation center of -363 meters AAT at the following coordinates: Latitude 58°17'56" N, Longitude 134°24'07' W. However, in the proposed DTV TOA, the FCC assigned the KTOO-DT Channel \*10 post-transition facility an ERP of only 0.748 kW with an antenna height radiation center of only 1 meter AAT at the following coordinates: Latitude 58°18'04" N, Longitude 134°25'21' W. Referring to Exhibit 1, it can be seen that the proposed DTV TOA facility's protected F(50,90) 36.0 dBuV/m noise limited contour for the KTOO-DT facility (red contour) would fall short of replicating its licensed digital F(50,90) 36.0 dBuV/m noise limited contour (green contour). Exhibit 2 demonstrates that the transmitter site assigned in the proposed DTV TOA is not the correct site for the KTOO-DT facility. Accordingly, CCB respectfully requests that the parameters assigned in the proposed DTV TOA reflect the authorized parameters in the existing KTOO-DT license (BLEDT-20040730ABD) for the Final DTV TOA.

In conclusion, CCB requests that the ERP assigned to the KTOO-DT Channel \*10 post-transition facility in the proposed DTV TOA be changed from 0.748 kW to 1 kW and the antenna height radiation center and site coordinates to be changed to match the existing digital license height and coordinates respectively.

### **Certification**

This technical statement was prepared by William T. Godfrey, Jr., Telecommunications Technical Consultant with Kessler and Gehman Associates, Inc. having offices in Gainesville, Florida and has been working in the field of radio and

***Kessler and Gehman Associates, Inc.***

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Telecommunications Consulting Engineers

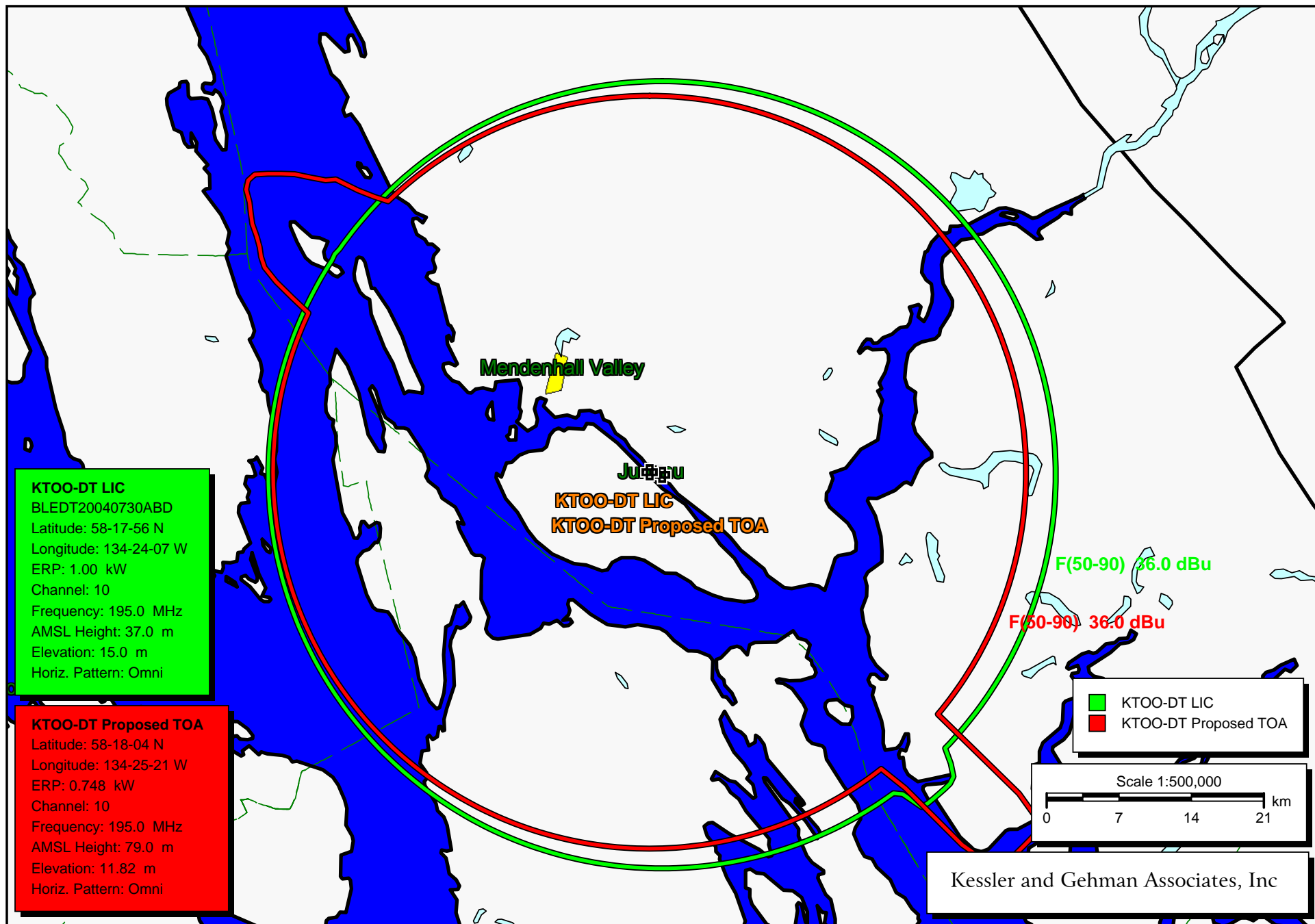
television broadcast consulting since 1998. He graduated from the University of North Florida with a Bachelor of Arts degree in Criminal Justice and a minor in Mathematics in 1993. As a Professional in the field of Telecommunications he states under penalty of perjury that the information contained in this report is true and correct to the best of his knowledge and belief.

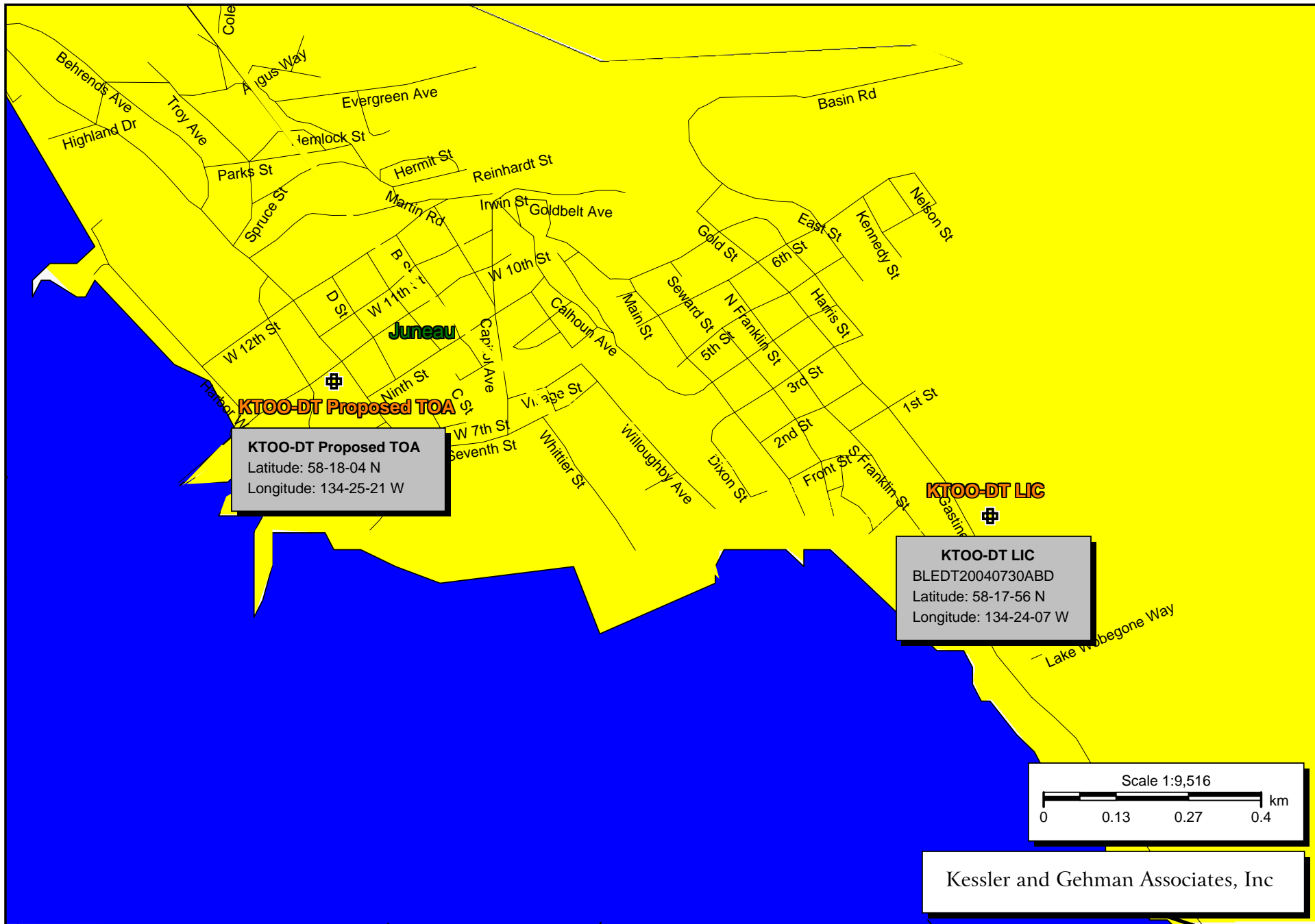


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WILLIAM T. GODFREY, JR.  
Telecommunications Technical Consultant

18 January, 2007





KTOO-DT Proposed DTV Table of Allotments Site vs. Licensed KTOO-DT Site

Kessler and Gehman Associates, Inc